

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CHIMENE MBAGUE NANDJOU, Individually, and
as Administratrix of THE ESTATE OF MENELIK
TCHOUAMOU and THE ESTATE OF WILLIAM
TCHOUAMOU GANJUI, and as Mother and Next
Friend of AURELLIA LLANA SALENG and WILMA
TCHOUAMOU MGABUE,

Plaintiff

v.

MARRIOTT INTERNATIONAL, INC.,
MARRIOTT WORLDWIDE CORPORATION, and
RELUXICORP, INC. d/b/a THE RESIDENCE INN
BY MARRIOTT,

Defendants.

CIV. ACT. NO.

1:18-cv-12230

**DECLARATION OF BANCROFT S. GORDON IN
SUPPORT OF DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

I, Bancroft S. Gordon, declare, pursuant to 28 U.S.C. § 1746, that:

1. I am the Corporate Secretary for Marriott International, Inc.
("Marriott International"). The information provided in this declaration is based
on my personal knowledge, as well as on a review of the corporate records of

Marriott International. If called as a witness, I would testify competently to the facts stated herein.

2. Marriott International is a corporation organized under the laws of Delaware.

3. Marriott International's principal place of business and corporate headquarters is in Bethesda, Maryland.

4. Marriott Worldwide Corporation ("MWC") is a wholly-owned subsidiary of Marriott International.

5. MWC is a corporation organized under the laws of Maryland.

6. MWC's principal place of business and corporate headquarters is in Bethesda, Maryland.

7. Marriott International and its subsidiaries or affiliates currently operate, franchise, or license more than 6,700 properties worldwide in 130 countries and territories. Marriott International's business is focused on managing hotels and franchising or licensing hotels owned by third-party owners, so Marriott International owns very few lodging properties. As of November 26, 2018, Marriott International and its subsidiaries or affiliates own only fifteen hotels worldwide. None are in Massachusetts.

8. As of November 26, 2018, there are 118 Marriott-branded properties open in Massachusetts. Neither Marriott International nor any of its subsidiaries or affiliates (including MWC) owns any of those 118 properties.

9. Of the 118 Marriott-branded properties in Massachusetts, 93 are franchised hotels owned and operated by independent third-parties under franchise agreements with Marriott International (79) or Marriott International's subsidiaries or affiliates (14), none of which is MWC.

10. The remaining Marriott-branded properties in Massachusetts (25) are managed hotels. Marriott International does not manage any of those hotels. Those hotels are managed by Marriott International's subsidiaries or affiliates, none of which is MWC.

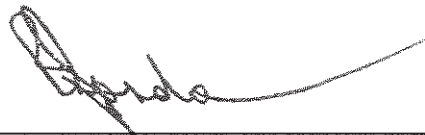
11. The hotel known as the Residence Inn Montreal Westmount, located at 2170 Lincoln Ave., Montreal, QC, Canada (the "Residence Inn"), is a franchised hotel owned by Reluxicorp, Inc. Reluxicorp, Inc. is not a subsidiary or affiliate of Marriott International or MWC, nor do Marriott International and Reluxicorp share any directors, officers or employees. Reluxicorp, Inc. has a license to use the Residence Inn by Marriott marks pursuant to a franchise agreement with Global Hospitality Licensing S.à r.l., a Luxembourg entity and a subsidiary of Marriott International.

12. Neither Marriott International nor any of its subsidiaries or affiliates (including MWC) owns, operates, manages, or controls the day-to-day operations of the Residence Inn or any of the Residence Inn's employees.

13. Neither Marriott International nor any of its subsidiaries or affiliates (including MWC) hire, employ, compensate, or otherwise direct or control the actions of any of the Residence Inn's employees.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 27, 2018



Bancroft S. Gordon